



A04-0060 10/31/01

***National
Environmental
Achievement Track***

Application Form

Eastover Mill

Name of facility

International Paper

Name of parent company (if any)

4001 McCords Ferry Road

Street address

Post Office Box B

Street address (continued)

Eastover, South Carolina 29044

City/State/Zip code

Give us information about your contact person for the
National Environmental Achievement Track Program.

Name Jim Witkowski

Title Environmental Engineering Manager

Phone 803-353-7916

Fax 803-353-7026

E-mail jim.witkowski@ipaper.com

Why do we need this information?

EPA needs background information on your facility to evaluate your application.

What do you need to do?

- Provide background information on your facility.
- Identify your environmental requirements.

Section A

Tell us about your facility.

1 What do you do or make at your facility?

Approximately 2000 tons per day of office / printing papers and market pulp; turpentine and soap are also produced as wood pulping by-products.

2 List the Standard Industrial Classification (SIC) code(s) or North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.

SIC
2621 2611 2861

NAICS

3 Does your company meet the Small Business Administration definition of a small business for your sector?

☐ Yes ☒ No

4 How many employees (full-time equivalents) currently work at your facility?

- ☐ Fewer than 50
☐ 50-99
☐ 100-499
☒ 500-1,000
☐ More than 1,000

Section A, continued

- 5 Does your facility have an EPA ID number(s)?

☒ Yes

☐ No

If yes, list in the right-hand column.

NPDES Permit: SC0038121

Title V Air Permit: TV-1900-0046

Industrial Landfill Permit: 403313-1601 (IWP-187)

Hazardous Waste Generator ID: SCD980709133

- 6 Identify the environmental requirements that apply to your facility. Use the Environmental Requirements Checklist, at the back of the instructions, as a reference. List your requirements to the right **or** enclose a completed Checklist with your application.

Checklist enclosed.

- 7 Check the appropriate box in the right-hand column.

☐ I've listed the requirements above.

☒ I've enclosed the Checklist with my application.

- 8 Optional: Is there anything else you would like to tell us about your facility?

The Eastover Mill is a large pulp and paper facility and the primary industry in Eastover, South Carolina. The Eastover Mill has state of the art pulping and bleaching processes, utilizing extended and oxygen delignification. The mill has extensive spill control and wastewater treatment systems, which result in an effluent with among the lowest pounds of pollutants of all kinds, per ton of product produced, of all pulp and paper mills in the country. The mill has an existing HVLC collection and control system, as well as advanced condensate stripping and reuse. The mill has in place an effective chemical control program that results in the facility having minimal hazardous waste generation; typically maintaining a Conditionally Exempt Small Quantity Generator status. The facility was started up in 1983 and is a recognized top environmental performer; as evidenced by charter membership in the South Carolina Environmental Excellence Program, enrollment in EPA's Voluntary Advanced Technology Incentives Program of the Cluster Rule, recognition as a South Carolina Governor's Pollution Prevention Award recipient in 2000 and 2001, and International Paper's most recent large facility Environmental Excellence Award winner.

Why do we need this information?

Facilities need to have an operating Environmental Management System (EMS) that meets certain requirements.

What do you need to do?

- Confirm that your EMS meets the Achievement Track requirements.
- Tell us if you have completed a self-assessment or have had a third-party assessment of your EMS.

Section B

Tell us about your EMS.

1 Check **yes** if your EMS meets the requirements for each element below as defined in the instructions.

a. Environmental policy

☒ Yes

b. Planning

☒ Yes

c. Implementation and operation

☒ Yes

d. Checking and corrective action

☒ Yes

e. Management review

☒ Yes

2 Have you completed at least one EMS cycle (plan-do-check-act)?

☒ Yes

3 Did this cycle include both an EMS and a compliance audit?

☒ Yes

4 Have you completed an objective self-assessment or third-party assessment of your EMS?

☒ Yes

If yes, what method of EMS assessment did you use?

☒ Self-assessment

☐ GEMI

☒ Other

☐ CEMP

"Balanced Scorecard" is used to set and track mill environmental goals and objectives which are derived from Corporate guidance and environmental policy. Assessment of compliance aspects of our EMS are completed by Corporate auditors. Our most recent audit was completed in September of 2001.

☐ Third-party assessment

☐ ISO 14001 Certification

☐ Other

Why do we need this information?

Facilities need to show that they are committed to improving their environmental performance. This means that you can describe past achievements and will make future commitments.

What do you need to do?

Refer to the Environmental Performance Table in the instructions to answer questions 1 and 2.

Section C

Tell us about your past achievements and future commitments.

- 1 Describe your past achievements for at least two environmental aspects. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you qualify as a small facility as defined in the instructions, you need to report past achievement for at least one environmental aspect.

First aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
	Quantity	Units	Quantity	Units
Total Energy Use (Energy Use)	See below	Pounds steam / hour	See below	Pounds steam / hour
i. How is the current level an improvement over the previous level?				
Recovery of waste heat resulted in a savings of over 100 thousand pounds per hour of process steam.				
ii. How did you achieve this improvement?				
Waste heat was recovered in the pulping, bleaching, and chemical recovery processes at the mill by installation of heat exchangers. These projects required a significant commitment of resources, including approximately \$2 million of capital.				

Second aspect you've selected

What aspect have you selected?	What was the previous level (2 years ago)?		What is the current level?	
Recycled/Reused Materials Use (Materials Use)	Quantity 0	Units Gallons / year ("re-refined oil")	Quantity 1,500,000	Units Gallons / year ("re-refined oil")
<p>i. How is the current level an improvement over the previous level?</p> <p>Use of an alternate fuel not utilized previously.</p>				
<p>ii. How did you achieve this improvement?</p> <p>The mill began using "re-refined oil" to replace virgin fuel oil. This not only promoted the collection and recycling of used oil, but also resulted in lower SO₂ emissions from the facility.</p>				

- 2 Select at least four environmental aspects (no more than two from any one category) from the Environmental Performance Table in the instructions and then tell us about your future commitments. If you need more space than is provided, attach copies of this page.

Note to small facilities: If you are a small facility, you need to make commitments for at least two environmental aspects in two different categories.

First aspect you've selected

- a. What is the aspect?
- Hazardous Materials Use (Materials Use)
- b. Is this aspect identified as significant in your EMS?
- ☒ Yes ☐ No
- c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.
- ☒ Option A:
Absolute value See Below
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

- ☒ Option A:
Absolute value See Below
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

Modify the bleaching process to reduce use of elemental chlorine (liquid and gaseous) by approximately 30 tons / day, far in advance of the date required by regulation. This will eliminate the need for 90 ton chlorine rail cars on site. These modifications are also anticipated to reduce significantly the air emissions of chloroform, the generation of chlorinated pollutants in wastewaters, and the potential for accidental releases.

Second aspect you've selected

a. What is the aspect?

Total Solid Waste (Waste)

b. Is this aspect identified as significant in your EMS?

☒ Yes ☐ No

c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output.

- ☒ Option A:
Absolute value 30 tons fiber / day
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output.

- ☒ Option A:
Absolute value 20 tons / day
(Quantity/Units)
- ☐ Option B:
In terms of
units of production (Quantity/Units)
or output

e. How will you achieve this improvement?

Increase machine runnability and improve broke management to reduce usable fiber losses from the paper machines. This will result in lower quantities of effluent treatment system primary clarifier sludge generated.

Third aspect you've selected

- | | | |
|---|--|--|
| a. What is the aspect? | Recycled/Reused Materials Use (Materials Use) | |
| b. Is this aspect identified as significant in your EMS? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output. | <input checked="" type="checkbox"/> Option A:
Absolute value | 0 tons TDF / year
(Quantity/Units) |
| | <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
| d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output. | <input checked="" type="checkbox"/> Option A:
Absolute value | 25,000 tons / year
(Quantity/Units) |
| | <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
| e. How will you achieve this improvement? | Utilize tire derived fuel (TDF) to replace "conventional" fuels in the No. 2 Power Boiler. This will address a solid waste disposal issue within the state. In addition, SO2 emissions will also be reduced by burning the TDF in this boiler. | |

Fourth aspect you've selected

- | | | |
|---|---|-------------------------------|
| a. What is the aspect? | Total Energy Use (Energy Use) | |
| b. Is this aspect identified as significant in your EMS? | <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No | |
| c. What is the current level? You may choose to state this as an absolute value or in terms of units of production or output. | <input checked="" type="checkbox"/> Option A:
Absolute value | See Below
(Quantity/Units) |
| | <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
| d. What is the level you are committing to achieve over the next three years? You may choose to state this as an absolute level or in terms of units of production or output. | <input checked="" type="checkbox"/> Option A:
Absolute value | See Below
(Quantity/Units) |
| | <input type="checkbox"/> Option B:
In terms of
units of production
or output | (Quantity/Units) |
| e. How will you achieve this improvement? | Modify the condensate removal systems of the paper machines to save the equivalent of 40,000 pounds / hour process steam. | |

Section D

Tell us about your public outreach and reporting.

Why do we need this information?

Facilities need to demonstrate their commitment to public outreach and performance reporting. You should have appropriate mechanisms in place to identify community concerns, to communicate with the public, and to provide information on your environmental performance.

What do you need to do?

- Describe your approach to public outreach.
- List three references who are familiar with your facility.

1 How do you identify and respond to community concerns?

- Interaction with our Community Communications Committee, which represents the people in our immediate surrounding area.

- Face to face meetings with individuals.

- Open dialogue with governmental officials.

2 How do you inform community members of important matters that affect them?

- Community Communications Committee meetings.

- Periodic mailings.

- Periodic open houses.

3 How will you make the Achievement Track Annual Performance Report available to the public?

☒ Website [www.Later](#)

☐ Newspaper

☒ Open Houses

☒ Other

- Community Communication Committee meetings.

- Mailings.

- News releases.

4 Are there any ongoing citizen suits against your facility? ☒ Yes ☐ No

If yes, describe briefly in the right-hand column.

This facility was mentioned as a "Pro Se" litigant in a suit filed by Launeil Sanders against EPA, SCDHEC, Bowater, and International Paper concerning alleged NPDES permit violations. The courts dismissed the case determining that it was without merit, but the plaintiff has appealed the decision.

5 List references below

	Organization	Name	Phone number
<i>Representative of a Community/ Citizen Group</i>	Eastover Mill Community Communications Committee	Ann Washington Owner / KolorPro	803-353-0167
<i>State/Local Regulator</i>	South Carolina Department of Health and Environmental Control	Bob King Assistant Deputy Commissioner	803-896-8940
<i>Other community/local reference</i>	University of South Carolina / Institute of Public Affairs	Mike Witowski Interim Director	803-777-4568

Section E

Application and Participation Statement.

On behalf of International Paper Eastover Mill
[my facility],

I certify that

- I have read and agree to the terms and conditions, as specified in the *National Environmental Achievement Track Program Description* and in the *Application Instructions*;
- I have personally examined and am familiar with the information contained in this Application (including, if attached, the Environmental Requirements Checklist). The information contained in this Application is, to the best of my knowledge and based on reasonable inquiry, true, accurate, and complete, and I have no reason to believe the facility would not meet all program requirements;
- My facility has an environmental management system (EMS), as defined in the Achievement Track EMS requirements, including systems to maintain compliance with all applicable federal, state, tribal, and local environmental requirements, in place at the facility, and the EMS will be maintained for the duration of the facility's participation in the program;
- My facility has conducted an objective assessment of its compliance with all federal, state, tribal, and local environmental requirements, and the facility has corrected all identified instances of potential or actual noncompliance;
- Based on the foregoing compliance assessment and subsequent corrective actions (if any were necessary), my facility is, to the best of my knowledge and based on reasonable inquiry, currently in compliance with applicable federal, state, tribal, and local environmental requirements.

I agree that EPA's decision whether to accept participants into or remove them from the National Environmental Achievement Track is wholly discretionary, and I waive any right that may exist under any law to challenge EPA's acceptance or removal decision.

I am the senior facility manager and fully authorized to execute this statement on behalf of the corporation or other legal entity whose facility is applying to this program.

Signature/Date

Printed Name/Title A. David Fary / Resident Manager

Facility Name International Paper / Eastover Mill

Facility Street Address 4001 McCords Ferry Road
Eastover, South Carolina 29044

Facility ID Numbers NPDES Permit: SC0038121
Title V Permit: TV-1900-0046
Industrial Landfill Permit: 403313-1601 (IWP-187)
Hazardous Waste Generator ID: SCD980709133

National Environmental Achievement Track

Environmental Requirements Checklist

We've included the following Checklist to help you answer questions in Section A, Tell us about your facility. The Checklist will help you identify the major federal, state, tribal, and local environmental requirements that apply at your facility, but it is not an exhaustive list of all environmental requirements that may be applicable at your facility.

If you use this Checklist and choose to submit it with your application, fill in your facility information below and enclose the completed Checklist with your application (see instructions).

Air Pollution Regulations

Check All That Apply

- ☐ 1. National Emission Standards for Hazardous Air Pollutants (40 CFR 61)
- ☒ 2. Permits and Registration of Air Pollution Sources
- ☒ 3. General Emission Standards, Prohibitions and Restrictions
- ☒ 4. Control of Incinerators
- ☒ 5. Process Industry Emission Standards
- ☒ 6. Control of Fuel Burning Equipment
- ☒ 7. Control of VOCs
- ☒ 8. Sampling, Testing and Reporting
- ☒ 9. Visible Emissions Standards
- ☒ 10. Control of Fugitive Dust
- ☒ 11. Toxic Air Pollutants Control
- ☐ 12. Vehicle Emissions Inspections and Testing

- ☒ 13. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above
 - National Emission Standards for Hazardous Air Pollutants (40 CFR 63)
 - New Source Performance Standards (40 CFR 60)
 - New Source Review Requirements (40 CFR 52)

Hazardous Waste Management Regulations

Check All That Apply

- ☒ 1. Identification and Listing of Hazardous Waste (40 CFR 261)
 - ☒ - Characteristic Waste
 - ☒ - Listed Waste
- ☒ 2. Standards Applicable to Generators of Hazardous Waste (40 CFR 262)
 - ☒ - Manifesting
 - ☒ - Pre-transport requirements
 - ☒ - Record keeping/reporting
- ☐ 3. Standards Applicable to Transporters of Hazardous Waste (40 CFR 263)
 - ☐ - Transfer facility requirements
 - ☐ - Manifest system and record-keeping
 - ☐ - Hazardous waste discharges
- ☐ 4. Standards for Owners and Operators of TSD Facilities (40 CFR 264)

- ☐ - General facility standards
- ☐ - Preparedness and prevention
- ☐ - Contingency plan and emergency procedures
- ☐ - Manifest system, Record keeping and reporting
- ☐ - Groundwater protection
- ☐ - Financial requirements
- ☐ - Use and management of containers
- ☐ - Tanks
- ☐ - Waste piles
- ☐ - Land treatment
- ☐ - Incinerators
- ☐ 5. Interim Standards for TSD Owners and Operators (40 CFR 265)
- ☐ 6. Interim Standards for Owners and Operators of New Hazardous Waste Land Disposal Facilities (40 CFR 267)
- ☐ 7. Administered Permit Program (Part B) (40 CFR 270)
- ☒ 8. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above
Underground Storage Tank Requirements (40 CFR 280)
Universal Waste Management Standards (40 CFR 273)
Used Oil Management Standards (40 CFR 279)

Hazardous Materials Management

Check All That Apply

- ☒ 1. Control of Pollution by Oil and Other Hazardous Substances (33 CFR 153)
- ☒ 2. Designation of Reportable Quantities and Notification of Hazardous Materials Spill (40 CFR 302)
- ☒ 3. Hazardous Materials Transportation Regulations (49 CFR 172-173)
- ☒ 4. Worker Right-to-Know Regulations (29 CFR 1910.1200)
- ☒ 5. Community Right-to-Know Regulations (40 CFR 350-372)
- ☐ 6. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Solid Waste Management

Check All That Apply

- ☒ 1. Criteria for Classification of Solid Waste Disposal Facilities and Practices (40 CFR 257)
- ☒ 2. Permit Requirements for Solid Waste Disposal Facilities
- ☒ 3. Installation of Systems of Refuse Disposal
- ☒ 4. Solid Waste Storage and Removal Requirements
- ☒ 5. Disposal Requirements for Special Wastes
- ☐ 6. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Water Pollution Control Requirements

Check All That Apply

- ☒ 1. Oil Spill Prevention Control and Countermeasures (SPCC) (40 CFR 112)
- ☒ 2. Designation of Hazardous Substances (40 CFR 116)
- ☒ 3. Determination of Reportable Quantities for Hazardous Substances (40 CFR 117)
- ☒ 4. NPDES Permit Requirements (40 CFR 122)
- ☒ 5. Toxic Pollutant Effluent Standards (40 CFR 129)
- ☐ 6. General Pretreatment Regulations for Existing and New Sources (40 CFR 403)
Name of POTW
ID # of POTW
- ☐ 7. Organic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 414)
- ☐ 8. Inorganic Chemicals Manufacturing Point Source Effluent Guidelines and Standards (40 CFR 415)
- ☐ 9. Plastics and Synthetics Point Source Effluent Guidelines and Standards (40 CFR 416)
- ☒ 10. Water Quality Standards
- ☒ 11. Effluent Limitations for Direct Dischargers
- ☒ 12. Permit Monitoring/Reporting Requirements
- ☒ 13. Classifications and Certifications of Operators and Superintendents of Industrial Wastewater Plants
- ☒ 14. Collection, Handling, and Processing of Sewage Sludge
- ☒ 15. Oil Discharge Containment, Control and Cleanup
- ☐ 16. Standards Applicable to Indirect Discharges (Pretreatment)
- ☒ 17. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above
Industrial Stormwater Requirements

Drinking Water Regulations

Check All That Apply

- ☐ 1. Underground Injection and Control Regulations, Criteria and Standards (40 CFR 144, 146)
- ☒ 2. National Primary Drinking Water Standards (40 CFR 141)
- ☒ 3. Community Water Systems, Monitoring and Reporting Requirements (40 CFR 141)
- ☒ 4. Permit Requirements for Appropriation/Use of Water from Surface or Subsurface Sources
- ☐ 5. Underground Injection Control Requirements
- ☒ 6. Monitoring, Reporting and Record keeping Requirements for Community Water Systems
- ☐ 7. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Toxic Substances

Check All That Apply

- ☒ 1. Manufacture and Import of Chemicals, Record-keeping and Reporting Requirements (40 CFR 704)
- ☒ 2. Import and Export of Chemicals (40 CFR 707)
- ☒ 3. Chemical Substances Inventory Reporting Requirements (40 CFR 710)
- ☒ 4. Chemical Information Rules (40 CFR 712)
- ☒ 5. Health and Safety Data Reporting (40 CFR 716)
- ☐ 6. Pre-Manufacture Notifications (40 CFR 720)
- ☐ 7. PCB Distribution Use, Storage and Disposal (40 CFR 761)
- ☒ 8. Regulations on Use of Fully Halogenated Chlorofluoroalkanes (40 CFR 762)
- ☐ 9. Storage and Disposal of Waste Material Containing TCDD (40 CFR 775)

- ☐ 10. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Pesticide Regulations

Check All That Apply

- ☒ 1. FIFRA Pesticide Use Classification (40 CFR 162)
- ☒ 2. Procedures Storage and Disposal of Pesticides and Containers (40 CFR 165)
- ☒ 3. Certification of Pesticide Applications (40 CFR 171)
- ☒ 4. Pesticide Licensing Requirements
- ☒ 5. Labeling of Pesticides
- ☒ 6. Pesticide Sales, Permits, Records, Application and Disposal Requirements
- ☒ 7. Disposal of Pesticide Containers
- ☒ 8. Restricted Use and Prohibited Pesticides

- ☐ 9. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Environmental Clean-Up, Restoration, Corrective Action

Check All That Apply

- ☐ 1. Comprehensive Environmental Response, Compensation and Liability Act (Superfund) (Please identify)

- ☐ 2. RCRA Corrective Action

- ☐ 3. Other (you must list these) Federal, State, Tribal or Local Regulations Not Listed Above

Facility Name International Paper / Eastover Mill
Facility Location: Eastover, South Carolina
Facility ID Number(s): NPDES Permit: SC0038121
Title V Permit:TV-1900-0046
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Hazardous Waste Generator ID: SCD980709133

The National Environmental Performance Track is a U.S. Environmental Protection Agency program. Please direct inquiries to 1-888-339-PTRK (7875) or e-mail ptrack@indecon.com. Mail completed applications to:

The Performance Track Information Center
c/o Industrial Economics Incorporated
2067 Massachusetts Avenue
4th Floor
Cambridge, MA 02140